



TSA Registered Traveler
Sponsoring Entity Guidelines

Contents

| | | |
|------------|--|----------|
| 1.1 | Initial Approval to Provide RT Services | 2 |
| 1.1.1 | Documentation Submission | 3 |
| 1.1.2 | Commencement of RT Operations..... | 3 |
| 1.1.3 | Notification | 4 |
| 2.1 | Ongoing Approval to Provide RT Services | 4 |
| 3.1 | TSA Oversight..... | 5 |



TSA Registered Traveler
Sponsoring Entity Guidelines

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Overview:

Under the Registered Traveler (RT) Business Model, Sponsoring Entities (SE) contract directly with Service Providers (SP) for services to support RT operations. Airports or air carriers that manage the RT program at a particular site or sites are subject to TSA regulations. These entities select and qualify all participating Service Providers in accordance with TSA Standards.

After an initial approval to provide RT services is granted by TSA and RT operations commence, SEs shall periodically monitor SP compliance with RT Standards. TSA reserves the right to immediately revoke its approval to provide RT services and/or disconnect RT systems from CIMS at any time, should significant instances of non-compliance with RT Standards occur.

1.1 Initial Approval to Provide RT Services

In order to receive TSA's initial approval to provide RT services, SEs shall complete the activities below:

| # | Activity | RT Standards Section Reference |
|---|---|--------------------------------|
| 1 | Obtain notification of SP participation results to ensure that the SP meets minimum eligibility requirements. Inform TSA on the SE/SP partnership. | N/A |
| 2 | Amend its Airport Security Plan (ASP) or Aircraft Operator Standard Security Plan (AOSSP) to incorporate governing RT documents. TSA will provide an amendment template to facilitate the process. | N/A |
| 3 | Obtain and approve a comprehensive System Security Plan designed by the SP(s) to meet RT information system security standards, in accordance with Appendix E: Sample System Security Plan template. | 2.2 |
| 4 | Obtain and approve a comprehensive self-assessment of compliance with RT information system security standards from its SP(s), based on TSA SP Self-Assessment procedures, including an SP management assertion statement on compliance with RT Standards. | 4.1 |



TSA Registered Traveler
Sponsoring Entity Guidelines

| # | Activity | RT Standards Section Reference |
|---|---|--------------------------------|
| 5 | Obtain and approve an IPA firm Attestation Report , procured by the SP(s) in accordance with the AICPA SSAE No. 10, and TSA IPA Attestation procedures. | 4.2.4 |
| 6 | ISA or MOU/A (based on the type of connection) with the CIMS System Owner, confirming that SP RT systems meet established RT interoperability specifications. (See NIST Special Publication 800-47 "Security Guide for Interconnecting Information Technology Systems" for additional guidance) | 3.4 |
| 7 | Receive an approval to provide RT services notification from TSA, based on TSA's review of the above documentation. | N/A |

Table 1-1 SE Pre-Implementation Checklist

1.1.1 Documentation Submission

SEs must compile and submit all documents electronically to: RTstandards@dhs.gov. All emails submitted must be smaller than 5MB. Submissions larger than 5MB must be divided into multiple emails. All emails must include in the subject line the following information: Sponsoring Entity name/Service Provider name, the phrase "RT Sponsoring Entity Documentation," and # of # emails. SEs may scan any additional attachments and include them with your electronic submission. TSA will not accept any electronic submission determined to contain a virus.

After submitting documentation electronically, applicants shall mail a hard-copy of the documentation and any attachments to TSA RT at:

Registered Traveler Program
RT Sponsoring Entity Documentation
Office of Transportation Threat Assessment and Credentialing (TTAC),
TSA-19, Transportation Security Administration
601 South 12th Street, Arlington, VA 22202-4220.

1.1.2 Commencement of RT Operations

TSA considers the commencement of RT operations to occur at the point in time when an RT system is connected to CIMS and TSA begins accepting enrollment applications. When an SE or



TSA Registered Traveler
Sponsoring Entity Guidelines

SP desires to commence RT Participant enrollment prior to receiving an initial TSA approval to provide RT services, appropriate disclosures shall notify enrollees that all such activities are not authorized by TSA, and that TSA is not responsible for loss or theft of participant enrollment data.

1.1.3 Notification

TSA will notify SEs about the evaluation results of their compliance documentation. Initial approval to provide RT services notification will be sent to the Federal Security Director responsible for the SE by U.S. mail and/or email. Should TSA determine that an SE's compliance documentation does not meet RT Standards, TSA will consult with the SE regarding the compliance deficiencies and assist the SE in establishing appropriate corrective actions and expected completion dates.

2.1 Ongoing Approval to Provide RT Services

Once TSA grants an initial approval to provide RT services to the SE, and RT program operations commence, SEs shall periodically monitor SP compliance with RT Standards.

To maintain TSA's approval to provide RT services, SEs shall complete the activities described in Table 2-1.

| Activity | Timing |
|---|--|
| Obtain and approve updated System Security Plan(s) designed by the SP(s) to meet RT Standards, in accordance with Appendix F: System Security Plan Template. | At least annually |
| Obtain and approve a comprehensive self-assessment of compliance with RT Standards from its SP(s), based on TSA Ongoing Compliance procedures in Section 4 of the RT Standards, as well as an SP management assertion statement on compliance with RT Standards. | SPs shall update their self assessment quarterly. SEs shall review self assessments at least annually. |
| Obtain and approve an IPA Attestation Report , procured by the SP(s) in accordance with the AICPA SSAE No. 10, and TSA Ongoing Compliance procedures. | Annually |

Table 2-1 SE Ongoing Compliance Checklist



TSA Registered Traveler

Sponsoring Entity Guidelines

TSA reserves the right to immediately revoke its approval to provide RT services and/or disconnect RT systems from CIMS at any time, should significant instances of non-compliance with RT Standards occur.

Due to the contractual relationship between the SE and SP, SEs shall have the primary responsibility of monitoring SP compliance with the RT Business Model, interoperability specifications, and RT Standards. SEs are responsible for assuring that SPs comply with all RT Standards. Also, SEs shall provide copies of all compliance documentation to TSA within ten business days from completion and receipt of the IPA firm Attestation Report.

3.1 TSA Oversight

TSA will review provided documentation to determine whether an SE and SP complies with RT Standards. TSA may identify issues or risks either included in compliance documentation or in information otherwise available to TSA that indicate non-compliance with RT Standards. SEs that do not comply with RT Standards will have no more than 72 hours from the date of notification by TSA to remedy compliance deficiencies. Severe deficiencies may require remediation more promptly than 72 hours.

With regard to identified deficiencies, TSA reserves the right to:

- Require SEs to remediate severe deficiencies sooner than 72 hours if such deficiencies represent an immediate risk to the security of participant data or other RT program operations;
- Immediately suspend or revoke its approval to provide RT services and/or disconnect RT systems from CIMS if significant areas of non-compliance are not remedied as required by TSA; and
- Independently verify that corrective actions to address compliance deficiencies are operating effectively to mitigate the risk associated with such deficiencies.

TSA may also conduct additional reviews, spot checks, audits, and/or other evaluations of an SP's compliance with RT Standards with or without notice to the SP or SE. Failure of an SE to comply with RT Standards or to cooperate with TSA will be considered by TSA in decisions regarding the ongoing participation of an SP in RT. This includes all currently approved SPs.

